

EXHIBIT 1



AHDOOT & WOLFSON, PC

ATTORNEYS



Tina Wolfson, Founding Partner

Ms. Wolfson was born in the former Soviet Union and her family escaped when she was eleven years old. Seven years after her family arrived to the United States as indigent political refugees, without speaking any English, she attended Columbia College and graduated *cum laude*.

She then attended and graduated Harvard Law School *cum laude* in 1994. Ms. Wolfson began her civil litigation career at the Los Angeles office of Morrison & Foerster, LLP, where she defended major corporations in complex actions and represented indigent individuals in immigration and deportation trials as part of the firm's *pro bono* practice. She then gained further invaluable litigation and trial experience at a boutique firm, focusing on representing plaintiffs on a contingency basis in civil rights and employee rights cases.

In March 1998, Ms. Wolfson and Robert Ahdoot founded AW. AW is a top tier law firm specializing in advocating consumer and employee rights. The attorneys at AW vigorously litigate against large corporations to vindicate the rights of millions of consumers or employees in protracted, complex litigation, to successful results.

AW has been appointed class counsel in numerous class actions, and, as a founding member, Ms. Wolfson has obtained extensive experience in prosecuting complex class action and representative lawsuits. She has served as plaintiffs' counsel/co-counsel or class counsel and litigated numerous class actions or representative actions against large corporate defendants involving varied consumer rights claims, with an emphasis on privacy rights.

Ms. Wolfson has been prosecuting cutting edge privacy cases on behalf of consumer classes since the late 1990's. She was among the first group of attorneys who successfully litigated the privacy rights of millions of consumers against major financial institutions. Plaintiffs alleged that the defendants used their personal information to compile detailed financial dossiers to use for internal marketing purposes and to sell them to third party telemarketers, without their consent. As lead counsel in these privacy class actions, Ms.

Wolfson brought the consumer claims to successful conclusion on a class-wide basis, conferring millions of dollars of benefits to consumers. The business practices that her clients challenged in these cases later became the subject of Gramm-Leach-Bliley Act regulation. At the time she was litigating and successfully resolving these cases, however, they were new territory. These consumer privacy class actions included, without limitation:

- *Zadeh v. Chase Manhattan Bank, et al.*, No. 323715 (Cal. Super. Ct., San Francisco Cty. (“SFSC”)).
- *Steinhaus v. American Express Travel Related Services Co. et al.*, No. 416248 (SFSC).
- *Bernard v. MBNA America Bank, et al.*, No. 408700 (SFSC).
- *Shakib v. Discover Bank, et al.*, No. 416194 (SFSC).
- *Baumsteiger v. FleetBoston, et al.*, No. 408698 (SFSC).
- *Lanchester v. Washington Mutual Bank, et al.*, No. 429754 (SFSC).

Ms. Wolfson and AW have extensive experience in leadership roles prosecuting consumer data breach and privacy class actions, including consolidated multidistrict litigation. AW’s successfully resolved and pending privacy class actions include, without limitation:

- *In re: Experian Data Breach Litig.*, No. 8:15-cv-01592-AG-DFM (C.D. Cal.): currently serving as appointed co-lead counsel managing a PSC of six firms, after contested application and hearing in consolidated litigation consisting of thirty-eight class actions arising from a data breach disclosing the sensitive financial information of over 15 million T-Mobile customers. The parties recently reached a settlement in principle.
- *In re: The Home Depot, Inc., Customer Data Sec. Breach Litig.*, No. 1:14-md-02583-TWT (N.D. Ga.): served, by court appointment, on the MDL Consumer Plaintiffs’ Steering Committee. The finally approved settlement provided approximately \$29 million of monetary relief to the consumer class, as well as robust injunctive relief requiring Home Depot to overhaul its data security practices.
- *Remijas v. Neiman Marcus Group, LLC*, No. 1:14-cv-01735 (N.D. Ill.): AW was responsible for briefing and arguing the groundbreaking appeal from the trial court’s order, which had granted the motion to dismiss on the pleadings based on lack of Article III standing. The Seventh Circuit’s landmark opinion was its first to address the Supreme Court’s decision in *Clapper v. Amnesty Int’l USA*, 568 U.S. 398 (2013). This Neiman Marcus opinion was the first appellate court to reject this view of *Clapper* and, adopting the plaintiffs’ reasoning, established, among other things, that data breach victims have standing to pursue claims based on the increased risk of identity theft and fraud, even before that theft or fraud

materializes. See generally 794 N.E.3d 688 (7th Cir. 2015) (reversed and remanded). Motion for final approval of class action pending, entitling each class member whose credit card was affected to make a claim for \$100.

- *In re: Premera Blue Cross Customer Data Sec. Breach Litig.*, No. 15-md-02633-SI (D. Or.): currently serving, by court appointment, on the Executive Leadership Committee after contested leadership application and hearing.
- *In Re: U.S. Office of Pers. Mgmt. Data Sec. Breach Litig.*, No. 1:15-mc-01394-ABJ (D.D.C.): currently serving, by court appointment, on the PSC, after contested leadership application and hearing, order of dismissal on appeal to the D.C. Circuit.
- *Gordon v. Chipotle Mexican Grill, Inc.*, No. 1:17-cv-01415-CMA-MLC (D. Colo.): serving as co-lead counsel for the putative consumer class arising from a nationwide restaurant payment card data breach.
- *Adlouni v. UCLA Health Sys. Auxiliary*, No. BC589243 (Cal. Super. Ct. Los Angeles Cty. (“LASC”)): currently serving by court appointment on PSC for plaintiff class allegedly impacted by university medical data breach, settlement agreement in principle pending.
- *L.D. v. Torrance Mem’l Med. Ctr.*, No. BC670591 (LASC): serving as co-lead counsel in a consolidated class action arising from a data breach of a private hospital’s medical records.
- *In re: YapStone Data Breach*, No. 4:15-cv-04429-JSW (N.D. Cal.): preliminarily approved class settlement provides credit monitoring and identity theft services to claimants (valued at approximately \$4.5 million annually in perpetuity), a non-reversionary fund to non-profit organizations, and injunctive relief in the form of YapStone implementing substantial data security measures.
- *S.A. v. Wash. State Univ.*, No. 17-2-23244-1 SEA (Wash. Super. Ct., King Cty.): serving as co-lead counsel in a consolidated class action arising from a data breach of personal information from a research storage facility.
- *Chimeno-Buzzi v. Hollister Co.*, No. 1:14-cv-23120-MGC (S.D. Fla.): AW served as class counsel in \$10 Million nationwide finally approved settlement arising from violations of the Telephone Consumer Protection Act of 1991 (“TCPA”).
- *Soukhaphonh v. Hot Topic, Inc.*, No. 2:16-cv-05124-DMG-AGR (C.D. Cal.): counsel for plaintiff in pending class action arising from violations of the TCPA.
- *Rivera v. Google, Inc.*, No. 1:16-cv-02714 (N.D. Ill.): prosecuting a class action for alleged violations of Illinois Biometric Information Privacy Act (“BIPA”).
- *Monroy v. Shutterfly, Inc.*, No. 1:16-cv-10984 (N.D. Ill.): prosecuting a class action for alleged violations of Illinois BIPA.

- *Melito v. American Eagle Outfitters, Inc.*, No. 1:14-cv-02440-VEC (S.D.N.Y.): \$14.5 million nationwide settlement arising from TCPA violations; final approval currently under appeal.
- *In re: Target Corp. Customer Data Sec. Breach Litig.*, No. 0:14-md-02522-PAM (D. Minn.): AW contributed considerable effort to vetting hundreds of potential class representatives, legal research involving the different state laws in play, the consolidated complaint, and significant discovery efforts.
- *Whitaker v. Health Net*, No. 2:11-cv-00910-KJM (E.D. Cal.): appointed to the Executive Committee in the consolidated action claiming violations of the California Confidentiality of Medical Information Act (“CMIA”).
- *Sutter Medical Information Cases*, No. JCCP 4698 (Cal. Super. Ct., Sacramento Cty.): appointed to the Executive Committee in the consolidated action claiming violations of California CMIA.

In addition to privacy-related class actions, AW has been appointed lead counsel in numerous other complex consumer class actions, some times in contested leadership applications. The following examples of such actions are either ongoing or have been successfully resolved, and have or will confer millions of dollars worth of benefits to the class, as well as injunctive relief:

- *Williams v. City of New York*, No. 1:17-cv-02303-RJD-SMG (E.D.N.Y.): serving as plaintiff’s counsel in class action alleging inadequate monitoring and supervision of inmates in city jails and indifference to inmate-on-inmate violence in violation of 42 U.S.C. § 1983 and 42 U.S.C. § 1988; motion for preliminary injunction under submission.
- *Eck v. City of Los Angeles*, No. BC577028 (LASC): appointed Class Counsel in the \$295 Million settlement in a class action arising out of alleged violations of California’s Propositions 218 and 26 by the City of Los Angeles when approving electricity rates that allegedly contained tax increases without voter approval. Final approval is pending. Settlement includes a \$52 Million cash fund and injunctive relief in the form of (i) direct tax savings valued at minimum of \$243 Million through fiscal year 2019-2020, (ii) an agreement to comply with the stated Propositions with respect to City of Los Angeles taxes on electricity use, and (iii) yearly audits to verify tax savings.
- *Kirby v. McAfee, Inc.*, No. 14-cv-02475-EJD (N.D. Cal.): appointed as co-lead class counsel. Plaintiffs challenged defendant’s auto renewal and false discount practices. The finally approved class action settlement made \$80 Million available to the class and included injunctive relief requiring McAfee to notify customers at the point of every sale that the service will be auto-renewed at an undiscounted subscription price. Further, the settlement required McAfee to change its policy

regarding the past product price it lists as a reference to any discount it's currently offering. McAfee will now only list a past price it has actually charged customers within the past 45 days.

- *McKnight v. Uber Techs., Inc.*, No. 3:14-cv-05615-JST (N.D. Cal.): amended class settlement for non-reversionary fund of \$32.5 million based on “safe ride” fee charged to Uber customers; preliminary approval granted and final approval pending.
- *Pantelyat v. Bank of Am., N.A.*, No. 1:16-cv-08964-AJN (S.D.N.Y.): serving as counsel for plaintiffs in class action arising from allegedly improper overdraft fees; preliminary approval of \$22 million class settlement pending, representing approximately 80% of total revenues gleaned by Bank of America's alleged conduct.
- *Smith v. Floor & Decor Outlets of Am., Inc.*, No. 1:15-cv-04316-ELR (N.D. Ga.): class action challenging product defect based on toxic emissions. \$14 Million class settlement finally approved by the court.
- *In re: Lumber Liquidators Chinese-Manufactured Flooring Durability Mktg. & Sales Practices Litig.*, No. 1:16-md-02743-AJT-TRJ (E.D. Va.): co-counsel for the plaintiff class claiming alleged misrepresentations of laminate flooring durability, coordinated with MDL proceedings regarding formaldehyde emissions; \$36 Million non-reversionary fund settlement in principle reached along with formaldehyde MDL.
- *Skeen v. BMW of N. Am., LLC*, No. 2:13-cv-01531-WHW-CLW (D.N.J.): served as one of six plaintiffs’ counsel on behalf of purchasers of MINI Coopers with allegedly defective timing chain and timing chain tensioners, secured an uncapped settlement fund granted final approval for claims for warranty extension, reimbursement for repairs, and compensation for sale at a loss.
- *In re: Uber FCRA Litig.*, No. 3:14-cv-05200-EMC (N.D. Cal.): final approval pending for class settlement providing \$7.5M in monetary relief to the class as well as injunctive relief guaranteeing Uber’s compliance with FCRA background check requirements.
- *Cassidy v. Reebok International Ltd.*, No. 2:10-cv-09966-AHM (C.D. Cal.): \$25 Million nationwide settlement of apparel false advertising case.
- *Carey v. New Balance Athletic Shoe, Inc.*, Nos. 1:11-cv-10632-LTS & 1:11-cv-10001-LTS (D. Mass.): \$3.7 Million nationwide settlement of apparel false advertising case.
- *Pappas v. Naked Juice Co. of Glendora, Inc.*, No. 2:11-cv-8276-JAK-PLA (C.D. Cal.): appointed co-lead counsel after contested applications; resulted in nationwide settlement for \$9 million non-reversionary fund and injunctive relief in the form

of product labeling changes, and periodic audits to assure compliance with labeling representations.

- *Trammell v. Barbara's Bakery, Inc.*, No. 3:12-cv-02664-CRB (N.D. Cal.): lead plaintiffs' counsel in \$4 Million non-revertible fund nationwide settlement of food false advertising case. The case alleged false advertising of food products as "all natural" and "non-GMO." In addition to the monetary relief, defendant agreed to correct the labeling, re-formulate its product to include only truly non-GMO ingredients, and obtain certification from the non-GMO Project, including periodic audits. When preliminarily approving the settlement, the Hon. Charles R. Breyer commented that the settlement was an "excellent settlement" and that both sides did "an excellent job of resolving the case," doing a "superb job" and presenting "a model of good lawyering on both sides"; when granting final approval to the settlement, Judge Breyer reiterated that the settlement was "very good" and that the case was "quite a successful class action."
- *West v. ExamSoft Worldwide Inc.*, No. 14-cv-22950-UU (S.D. Fla.): \$2 Million nationwide settlement arising from software error on bar exam.
- *Mirto v. AIG/Granite State Insurance Co. et al.*, No. HG 04180408 (Cal. Super. Ct., Alameda Cty.): \$3 Million California settlement re insurance discriminatory pricing.
- *In re: Kind LLC "All Natural" Litig.*, No. 1:15-md-02645-WHP (S.D.N.Y.): currently serving as appointed interim co-lead counsel for the plaintiff class by MDL Court after contested hearing. Motion to lift stay pending.
- *Citizens for Responsible Business v. Rite Aid Corporation, et al.*, No. 414831 (SFSC): prosecuted claims of false and illegal labeling in the herbal supplement industry against 107 retailers and manufacturers, who were gleaned millions of dollars from this nationwide practice; AW was successful in completely eradicating the alleged illegal practice in the United States.
- *Weiss v. Los Angeles*, No. BC141354 (LASC): currently serving as class counsel in this action challenging the defendant's review of parking violations, won *writ of mandate* trial to stop the allegedly illegal practice.
- *Lavinsky vs. City of Los Angeles*, No. BC542245 (LASC): appointed Class Counsel at class certification on behalf of LA residents challenging allegedly illegal utilities taxation practices. Preparing preliminary approval of substantial class action settlement the terms of which are currently confidential.

Ms. Wolfson serves as a co-chair of the Federal Torts Section of the Federal Bar Association. She co-authored, along with AW associate Bradley King, an article discussing developments in enforcement of arbitration agreements. Tina Wolfson & Bradley King, *Even After Concepcion and Italian Colors, Some Arbitration Agreements Are Not Enforceable*,

FED. LAWYER, Jan./Feb. 2015, at 19.

Additionally, Ms. Wolfson frequently lectures on numerous topics related to class action litigation across the country. An incomplete list of her speaking engagements is as follows:

- HarrisMartin: “‘Just the Facts’: The Equifax Breach – Pre-Breach Events and Post-Breach Responses,” November 2017, Atlanta (Co-Chair).
- Association of Business Trial Lawyers: “Navigating Class Action Settlement Negotiations and Court Approval: A Discussion with the Experts,” May 2017, Los Angeles; featuring the Hon. Philip S. Gutierrez and the Hon. Jay C. Gandhi.
- American Conference Institute: “2nd Cross-Industry and Interdisciplinary Summit on Defending and Managing Complex Class Actions,” April 2017, New York: Class Action Mock Settlement Exercise featuring the Hon. Anthony J. Mohr.
- CalBar Privacy Panel: “Privacy Law Symposium: Insider Views on Emerging Trends in Privacy Law Litigation and Enforcement Actions in California,” March 2017, Los Angeles (Moderator), featuring the Hon. Kim Dunning.
- Federal Bar Association: Northern District of California Chapter “2016 Class Action Symposium,” December, 2016, San Francisco (Co-Chair); featuring the Hon. Joseph F. Anderson, Jr., and the Hon. Susan Y. Illston.
- Federal Bar Association: The Future of Class Actions, featuring the Hon. Jon Tigar and the Hon. Laurel Beeler, “Cutting Edge Topics in Class Action Litigation,” November 2015, San Francisco (Co-Chair and Faculty), featuring the Hon. Jon S. Tigar and the Hon. Laurel Beeler.
- American Association for Justice: AAJ 2015 Annual Convention – “The Mechanics of Class Action Certification,” July 2015, Montreal.
- HarrisMartin: Data Breach Litigation Conference: The Coming of Age – “The First Hurdles: Standing and Other Motion to Dismiss Arguments,” March 2015, San Diego.
- Bridgeport: 2015 Annual Consumer Class Action Conference, February 2015, Miami (Co-Chair).
- Venable, LLP: Invited by former opposing counsel to present mock oral argument on a motion to certify the class in a food labeling case, Hon. Marilyn Hall Patel (Ret.) presiding, October 2014, San Francisco.
- Bridgeport: 15th Annual Class Action Litigation Conference – “Food Labeling and Nutritional Claim Specific Class Actions,” September 2014, San Francisco (Co-Chair and Panelist).
- Bridgeport: 2014 Consumer Class Action Conference – “Hot Topics in Food

Class Action Litigation,” June 2014, Chicago.

- Perrin Conferences: Challenges Facing the Food and Beverage Industries in Complex Consumer Litigations, invited to discuss cutting edge developments in settlement negotiations, notice, and other topics, April 2014, Chicago.
- Bridgeport: Class Action Litigation & Management Conference – “Getting Your Settlement Approved,” April 2014, Los Angeles.
- HarrisMartin: Target Data Security Breach Litigation Conference – “Neiman Marcus and Michael’s Data Breach Cases and the Future of Data Breach Cases,” March 2014, San Diego.
- Bridgeport: Advertising, Marketing & Media Law: Litigation and Best Management Practices – “Class Waivers and Arbitration Provisions Post-*Concepcion* / *Oxford Health Care*,” March 2014, Los Angeles.